

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

AMERICAN AIRLINES, INC., §  
§  
Plaintiff, §  
§  
v. § Civil Action No. 4:23-cv-00775-P  
§  
KIWI.COM, INC. and KIWI.COM, S.R.O., §  
§  
Defendants. §

**MOTION FOR LEAVE TO SUBMIT APPLICATION FOR ADMISSION TO THE BAR  
OF THE UNITED STATES COURT FOR THE NORTHERN DISTRICT OF TEXAS IN  
LIEU OF APPLICATION FOR ADMISSION PRO HAC VICE**

On August 24, 2023, the Court entered an Order requiring Cameron Nelson and Nathan James Muyskens, both of Greenburg Traurig, LLP and counsel for Plaintiff American Airlines, Inc., to apply for admission *pro hac vice* by August 31, 2023. [Dkt. No. 12 at 1]. Mr. Muyskens filed an Application for Admission *Pro Hac Vice* on August 25, 2023. [See Dkt. No. 13]. The Court denied Mr. Muyskens's application and ordered him to instead be admitted to the bar of the Northern District of Texas. [Dkt. No. 14 at 1].

Based on the Court's Orders,<sup>1</sup> Mr. Muyskens and Mr. Nelson have prepared Applications for Admission to the Bar of the United States Court for the Northern District of Texas. While Mr. Muyskens has already submitted his application to this Court, Mr. Nelson has not yet been able to submit an application as he has not yet received a Certificate of Good Standing from the State Bar of Illinois. Mr. Nelson therefore respectfully requests that he be

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<sup>1</sup> Mr. Nelson prior *pro hac vice* admissions in the Northern District of Texas in recent years are nearly identical to those of Mr. Muyskens. Based on that fact and the Court's Order denying Mr. Muyskens's *pro hac vice* application [Dkt. No. 14], Mr. Nelson requests admission to the Northern District of Texas rather than for admission *pro hac vice* for this case only.

permitted to submit an Application for Admission to the Bar on or before September 7, 2023,<sup>2</sup> rather than file an application for admission *pro hac vice* on or before August 31, 2023.

Dated: August 31, 2023

Respectfully submitted,

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<sup>2</sup> Mr. Nelson expects to receive a Certificate of Good Standing tomorrow, September 1, 2023, absent any unforeseeable delay, and will promptly submit his Application for Admission to the Bar upon receipt of the Certificate.